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** Admitted Pro Hac Vice*

Attorneys for Plaintiff and the Proposed Collective

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

**HEATHER MADSEN, individually and on
behalf of all persons similarly situated,**

Plaintiff,

v.

**SIDWELL AIR FREIGHT, INC, and DHL
EXPRESS (USA) INC., d/b/a DHL
EXPRESS,**

Defendants.

**NOTICE OF SETTLEMENT AND
REQUEST TO STAY**

Civil No.: 1:23-CV-00008-JNP

Judge Jill N. Parrish

Plaintiff Heather Madsen and Defendants Sidwell Air Freight, Inc. (“Sidwell”) and DHL Express (USA), Inc. (“DHL”), (together, the “Parties”), file this Notice of Settlement, and state as follows:

1. On February 27, 2024, the Parties participated in an in-person mediation at the offices of Berger Montague PC, with experienced mediator Dennis Clifford of Houston, Texas. The mediation involved the instant matter and a related matter captioned *Roberts, et al. v. Sidwell Air Freight, Inc., et al.*, No. 3:21-cv-05912-TMC (W.D. Wash.) (together, the “Actions”).

2. The Parties have reached a settlement in the Actions and are in the process of drafting and finalizing a Settlement Agreement which will be submitted for approval. For efficiency and judicial economy, the Parties are stipulating to transfer the instant matter to the Western District of Washington and consolidate with the first-filed *Roberts* matter.

3. The Parties request to stay the above-captioned matter, the Court’s adjudication of any pending motions, and all case management deadlines and obligations until the Parties file a voluntary dismissal.

THEREFORE, the Parties respectfully request that the Court stay the above-captioned matter, the Court’s adjudication of any pending motions, and all case management deadlines and obligations.

Dated: March 18, 2024

/s/ Camille Fundora Rodriguez

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Respectfully submitted,

/s/ Jeanne D. Marshall (w/ permission)

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by ECF on all known parties on
March 18, 2024.

/s/ Camille Fundora Rodriguez
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